

**From:** "Robert Lee" <robertl@centralbankhouston.com> on 05/05/2005 01:51:44 PM

**Subject:** EGRPRA

The purpose of this comment is to address the increased regulatory burden of the CTR and SAR filings. The CTR threshold of \$10,000.01 has been the same for a long period of time. Everyone knows the number. Most bank customers believe the CTR is used to report income to IRS. Banks are now compelled to file CTR's on aggregated transactions that meet the threshold and SAR's on the individual deposits that make up the total. Lowering the threshold to \$5,000 would avoid this double filing of paperwork. Most SAR's are now filed for structuring of deposits. The way the customer conducts business has not changed but now a defensive SAR is required to be filed to avoid a violation and a SAR is required every 90 days on the customer. Banks have always monitored customers for suspicious activity not only because of BSA but because we don't want to take a loss. The interpretation of suspicious activity has been changed by the examiners and the banks have not had a fair chance to prepare for the ramifications of that change.

Robert Lee  
Central Bank  
Houston TX